

Testimony of
Molly Rauch, MPH
Public Health Policy Director
Moms Clean Air Force
on
July 17, 2018
for
Censored Science Hearing
Docket Identification No. [EPA-HQ-EPA-HQ-OA-2018-0259]
at
EPA Headquarters
William Jefferson Clinton East Building, Main Floor
Room 1153
1201 Constitution Avenue NW., Washington, DC 20460
Public Hearing Testimony

Hello, my name is Molly Rauch and I am Public Health Policy Director with Moms Clean Air Force. Thank you for this opportunity to offer comment. On behalf of more than one million members of Moms Clean Air Force, I am here today to strongly oppose the administration's attempts to censor the science used in public health decision making.

This intentionally misleading proposal is being sold by EPA leadership as an effort to increase "transparency." But the facts suggest that the real motivation is simply to sweep under the rug the scientific evidence disfavored by polluting companies. The proposal would prevent EPA from using studies that are based on personal medical data, thereby eliminating some of the most important long-term epidemiological studies investigating the impacts of pollution on public health. Hundreds of scientists have spoken out against this proposal.

Indeed, this flimsy proposal was designed without adequate input from the scientific community, according to members of EPA's own Scientific Advisory Board. It was rushed through the regulatory process, and was originally proposed with a gallingly short public comment period, suggesting an intention of casting less light on the rulemaking process, not more. For a proposal that posits a sweeping change in the health-based rulemaking that is the foundation of the EPA, it was quite the sleight of hand.

As a public health expert who has been closely following EPA's rulemaking process for more than a decade, it is evident that this proposal is a cynical ploy to bolster polluting industries that don't like the results of longitudinal research.

Who does this benefit? Who really benefits from this charade? Not the families everywhere who want to breathe clean air and drink clean water. Not frontline communities dealing with multiple pollution exposures from many industrial sources. Not the millions of children with asthma across the country whose disease can be worsened by small changes in air quality day to day. Not the elderly, and those with underlying health problems, whose likelihood of being admitted to the hospital, of having a stroke, of having a heart attack, of dying – could depend on the levels of particulate pollution in the air. It does not benefit these people.

I have a master's in Public Health. One of the most valuable things I learned in graduate school was how to evaluate the reliability of epidemiological studies. We learned the importance of considering many different criteria. Whether the raw data was available to me was never grounds for automatically discounting the credibility of research. The idea that an entire library of studies would be rejected, based simply on that one external criteria, represents a crude approach, to put it kindly.

We also learned about the ironclad importance of treating study subjects ethically and with respect. All research on humans must be approved by an Institutional Review Board, which prioritizes the privacy and consent of the study subject. There are laws about this. When study subjects are disrespected, terrible things can happen. There's a reason that we had to learn about the Tuskegee study of untreated syphilis in African American men. We cannot go back to a time when the study subject is a mere pawn in someone else's game. Treating study subjects ethically requires protecting their privacy.

Finally, we studied the tactics of polluting industries, and their shameful legacy of attempting to undermine science. Whether it was the tobacco industry or the lead industry, we learned about the deliberate, expensive, decades-long campaigns to protect corporate profits – and meanwhile, people were literally dying as a result. This is

an old story. We've heard it before. Today, we are hearing that story again. Public health professionals are trained to recognize this story, and call it out.

This proposal is an excuse to hamstring researchers, weaken public health protections, and pad the profits of polluting industries.

As a public health professional, as a mother, and on behalf of Moms Clean Air Force and our more than one million members, I strongly urge the EPA to stop this radical proposal – for the health and safety of all Americans.

